

REMARKS

Reconsideration and allowance in view of the foregoing amendment and the following remarks are respectfully requested. At the time of the Office Action, claims 1-8 and 17-20 were pending.

Amendments to the Claims

Claims 1 and 17 are amended without prejudice or disclaimer. Support for these amendments is found throughout the Specification (e.g., page 18, paragraphs [1079]-[1080]). No new subject matter has been introduced by way of these amendments.

Rejection of Claims 1-3, 5-6, 8-11, 13-14, and 16-22 Under 35 U.S.C. §103(a)

The Office Action rejects claims 1-3, 5-6, 8-11, 13-14, and 16-22 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,173,261 to Arai et al. ("Arai") (including inherent characteristics of U.S. Patent No. 5,860,063 to Arai et al. ("Arai 2")) in view of Attwater et al. (U.S. Patent No. 6,839,671) ("Attwater"). Assignee respectfully disagrees. However, in view of the amendments to claims 1 and 17, Assignee respectfully submits that these rejections are moot.

With respect to amended claim 1, Assignee respectfully submits that Arai, alone or in combination with any other references of record fails to disclose or suggest the step of generating call types for a first natural language understanding (NLU) model based on call types with high probabilities in an existing NLU model for a different application. According to the Office Action, Arai (in combination with Arai 2, via inherency) discloses the step of generating call types for an NLU model based on a set of utterances selected from a group of unlabeled utterances. However, Arai, alone or inherently in view of Arai 2, fails to disclose or suggest the concept of generating call types for an NLU model for an application (e.g., a dialog application

in the retail sector) based on the call types with high probabilities from another NLU model for a different application (e.g., another application in the retail sector). Rather, Assignee respectfully submits that Arai discloses generation of call types in isolation. That is, call types are generated with no regard to the call types that have been generated for existing NLU models for other applications, including related applications. Further, Assignee respectfully submits that this feature is also not disclosed in Attwater or the other references cited in the Office Action. In contrast, claim 1, as amended, explicitly recites generating the call types for the first NLU based on the high probability call types for an existing NLU model for a different application.

In view of the foregoing, Assignee respectfully submits that claim 1, as amended, is patentable over the combination of Arai and Attwater. Accordingly, Assignee respectfully requests withdrawal of the rejection of claim 1.

With respect to claim 17, as amended, this claim recites substantially similar limitations as those described above with respect to amended claim 1. Therefore, for at least the reasons presented above with respect to amended claim 1, Assignee respectfully submits that claim 17, as amended, is also patentable over the combination of Arai and Attwater. Accordingly, Assignee respectfully requests withdrawal of the rejection of claim 17.

With respect to claims 2, 3, 5-6, 8-11, 13-14, 16 and 18-22, each of these claims is dependent on one of amended claims 1 and 17, while reciting additional limitations. Therefore, for at least the reasons presented above with respect to amended claims 1 and 17, Assignee respectfully submits these dependent claims are also patentable over the combination of Arai and Attwater. Accordingly, Assignee respectfully requests withdrawal of the rejections of these dependent claims.

Rejection of Claims 4 and 7 Under 35 U.S.C. §103(a)

The Office Action rejects claims 4 and 7 under 35 U.S.C. §103(a) as being unpatentable over Arai in view of Attwater and further in view of U.S. Patent Publication No. 2003/0088421 to Maes et al. ("Maes"). Assignee respectfully disagrees. However, in view of the amendments to claims 1 and 17, these rejections are moot. Assignee does not acquiesce that it would have been obvious to one of skill in the art to combine these references in the manner proposed in the Office Action and reserves the right to argue against this combination in future prosecution.

In particular, each of claims 4 and 7 is dependent on amended claims 1, while reciting additional limitations. Therefore, for at least the reasons presented above with respect to amended claim 1, Assignee respectfully submits these dependent claims are also patentable over Arai and Attwater, alone or in combination with Maes. Accordingly, Assignee respectfully requests withdrawal of the rejections of these dependent claims.

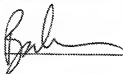
CONCLUSION

Having addressed all rejections and objections, the subject application is in condition for allowance and a Notice to that effect is earnestly solicited. If necessary, the Commissioner for Patents is authorized to charge or credit the **Novak, Druce & Quigg, LLP, Account No. 14-1437** for any deficiency or overpayment.

Respectfully submitted,

Date: September 29, 2010

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